

November 2, 2007

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: WT Docket No. 01-309
HAC Digital Wireless Telephones

Annual Report

Dear Ms. Dortch:

The Filer, North Dakota Network Co. ("NDNC") is the licensee of Stations KNLH232 (D-Block – Minot, North Dakota BTA), and KNLH234 (F-Block – Minot, North Dakota BTA) in the broadband Personal Communications Service. This report is submitted pursuant to the requirements of Paragraph Nos. 89-91 of the Commission's Report and Order (WT Docket No. 01-309) FCC 03-168, released August 14, 2003 ("R&O").

By way of background, the Filer is a small, Tier III Commercial Mobile Radio Service licensee, as defined in the Commission's E-911 Order to Stay, FCC 02-210, released July 26, 2002. The Filer's wireless system employs a CDMA air interface. NDNC markets six (6) models of digital wireless handsets, which are listed below.

ANSI C63.19			
<u>Handset Make and Model</u>	<u>FCC ID</u>	<u>M-Rating</u>	<u>T-Rating</u>
Motorola V3m	FCC ID: IHDT56FT1	M4	T4
Motorola W315	FCC ID: IHDT56GE1	M3	-
Motorola V323i	FCC ID: IHDT56GS1	M4	T4
Motorola K1m	FCC ID: IHDT56GH1	M4	T4
Motorola L7c	FCC ID: IHDT56GQ1	M4	T4
Kyocera K323	FCC ID: OVFKWCK24B	M3	T4

To achieve compliance with the requirements of the R&O, the Filer is at the mercy of the handset manufacturers to develop and market HAC-compliant digital wireless handsets. As a small, Tier III wireless carrier, the Filer has no influence over the product development and distribution decisions of wireless handset manufacturers; and, accordingly must rely on the manufacturers to develop HAC-compliant digital wireless handsets for use on the Filer's system.

Given the foregoing, the information requested by the Commission is identified as follows:

Item 1: Digital Wireless Phones Tested – None. As described above, the Filer is a small carrier that is not involved in the handset development or testing process. The Filer will rely on testing performed by the handset manufacturers.

Item 2: Laboratory Used – None. See Response to Item 1.

Item 3: Test Results for Each Phone Tested – Not applicable. See Response to Item 1.

Item 4: Identification of Compliant Phone Models and Ratings According to ANSI C63.19

<u>Handset Make and Model</u>	<u>FCC ID</u>	<u>ANSI C63-19</u>	
		<u>M-Rating</u>	<u>T-Rating</u>
Motorola V3m	FCC ID: IHDT56FT1	M4	T4
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Motorola V323i	FCC ID: IHDT56GS1	M4	T4
Motorola K1m	FCC ID: IHDT56GH1	M4	T4
Motorola L7c	FCC ID: IHDT56GQ1	M4	T4
Kyocera K323	FCC ID: OVFKWCK24B	M3	T4

Item 5: Report on the Status of Product Labeling – The Filer is not involved in product labeling or the development of labeling standards. However, we are aware that some confusion may arise regarding the handset labeling standards contained in the 2001 and draft 2005 version of the C63.19 standard, which specify different letter designations for HAC compliance. While the 2001 version of the C63.19 standard uses a “U” rating for radio frequency (RF) immunity and a “UT” rating for acoustic coupling, the 2005 version uses labeling that is consistent with the switches on hearing aids (i.e., specifying “M” for Microphone and “T” for T-Coil). Accordingly, all compliant handsets offered by the Filer will be labeled with the “M” and “T” ratings associated with the 2005 draft version of the ANSI technical standard, as appropriate.¹

Item 6: Report on Outreach Efforts – The Filer has developed a hearing aid compatibility information sheet to assist hearing impaired customers in selecting current model phones and accessories most suitable to their needs. This information sheet will also serve to educate the Filer’s employees and retail sales force about HAC-related issues and possible solutions.

Item 7: Information Related to Retail Availability of Compliant Phones – As discussed above, the Filer has been diligent in identifying and obtaining a variety of CDMA handsets that have received an M3 rating or better, and a T4 rating, under ANSI Standard C63.19.

In addition, the Filer offers one headset model, Plantronics M210c. According to the manufacturer, this headset is not HAC compatible.

¹ See In the Matter of Section 68.4(a) of the Commission’s Rules Governing Hearing Aid-Compatible Telephones, *Order on Reconsideration and Further Notice of Proposed Rule Making*, 36 CR 190, 20 FCC Rcd 11221 at ¶¶ 33-36 (2005).

Item 8: Information Related to Incorporating Hearing Aid Compatibility Features Into Newer Models of Digital Wireless Phones – The incorporation of HAC features into newer models of digital wireless telephones will be accomplished by the handset manufacturers.

Item 9: Any Activities Related to ANSI 63.19 or Other Standards Work Intended to Promote Compliance with the Requirements of the Commission's Report and Order – None. The Filer is a small carrier that is not involved in standards development.

Item 10: Total Numbers of Compliant and Non-Compliant Phone Models Offered as of the Date of this Report - As noted above, the Filer currently offers six (6) different models of CDMA handsets. Currently, all six (6) meet the ANSI C63.19 M-Rating, and five (5) are at a T4 T-Rating.

Item 11: Any Ongoing Efforts for Interoperability Testing with Hearing Aid Devices – None. The Filer is a small carrier that is not involved in handset interoperability testing with hearing aid devices.

Should you have any questions concerning this report, please contact John Prendergast or Cary Mitchell of the law firm of Blooston, Mordkofsky, Dickens, Duffy & Prendergast, LLP. Either may be reached by calling (202) 659-0830.

Respectfully submitted,
NORTH DAKOTA NETWORK CO.



John A. Reiser
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